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PROTECTIVE EQUIPMENT

A. All personnel working on the vessels will be issued the necessary protective clothing as required to perform their job description.

1. Asbestos workers will use a minimum spun-bound disposable suits with hoods and boots, rubber boots, rubber gloves required respirator, hearing protection and eye protection. More detail is in "Asbestos Program".

2. Hazardous material handlers will use as a minimum type disposable suits with hoods and boots, rubber boots, rubber gloves, required respirator, hearing protection, eye protection.

3. Cutters will use as a minimum; fire retardant coveralls, steel toed boots, leather gloves, required respiratory protection, full face shield, hearing protection, eye protection.

All personnel will be required to wear hard hats when work is being performed overhead in the same area.

surfaces established by Marine Architects) to identify the composition of these surfaces. These materials will be analyzed in accordance with the requirements of 29 CFR-OSHA and 40 CFR-EPL. All samples will be sent to an appropriate laboratory. The laboratory will be selected on the basis of qualifications, credentials and cost. The government will be notified thirty days prior to the selection of the laboratory for approval. All laboratory qualifications will be submitted for review and approval.

C. Exposure Monitoring

An air monitoring program (AMP) will be implemented to determine whether OSHA action levels are exceeded for any of these materials. The initial determination includes collection of air samples for the presence of any of the above-mentioned contaminants covered under this P&P. The representative number of air samples will be collected where workers are possibly exposed to these contaminants. All air sample results will be compared with 29 CFR 1915 and 1929-OSHA Permissible Exposure Limits (PELS), and latest edition of American Conference of Governmental Industrial Hygienists (ACGIH) Threshold Limit Values (ACGIH-TLVs). In carrying out this AMP, 25% of the total work force will be participating in this personal air monitoring. If any results indicate the exposure levels exceed PEL and TLVs, the following procedures will be activated:

1. The employees will be notified in writing within five days.
2. The proper engineering controls will be put in place in order to reduce contamination levels to levels below PEL and TLV.
3. The respiratory protective equipment will be upgraded.

D. Medical Monitoring

A medical surveillance program will be in effect for all clean-up operations. All

employees who are or may be exposed to heavy metals in paints or metals, will undergo appropriate medical examinations per requirements of 29 CFR-OSHA 1915 and 1926. Medical examinations may be combined for all hazards identified for the individual workers; i. e. asbestos, HAZWOPER, OPP, lead, etc.. These combined medical examinations will meet the requirements of each regulated material exposure examination, as determined by the examining physician. The frequency of these medical examinations are defined in 29 CFR-OSHA 1915 and 1926. An accurate record of medical surveillance required by 29 CFR-OSHA will be retained and submitted to government representatives upon the completion of the scrapping.

E. Engineering Control

In order to reduce the level of air contaminants, mechanical ventilation will be implemented as follows:

1. General mechanical ventilation will be of sufficient capacity and so arranged as to produce the number of air changes necessary to maintain the fumes and air contaminants within safe limits.
2. The contaminated air will be exhausted from the working spaces into open air by use of HEPA filtered exhaust machines.

F. Waste and Waste Water Discharge Prevention

Waste and waste water discharge prevention procedures are covered under the same title in detail in a separate section.

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PERSONAL DECONTAMINATION

A. Shower Facilities

1. A remote shower with hot and cold running water will be available at each vessel for all personnel, including welders, cutters and laborers. Asbestos workers will have a shower attached to containments for their use only. When mini-enclosures or glove-bags are used for asbestos removal, the asbestos workers will use the remote shower.

2. A hand and face wash station will be established for all persons leaving the vessel. This wash station will be established between the vessel and lunch area or parking area.

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OIL AND PETROLEUM PRODUCTS

A. Introduction

This section deals with the procedures and policies (P&P) which will be implemented and observed while working on the scrapping of the vessel. The applicable rules and regulations are defined in 40 CFR "Environmental Protection Laws" (EPL) and 49 CFR "Transportation Laws" (TL). This P&P defines oil and petroleum products (OPP) as a substance or material that has been determined by the Secretary of the Department of Transportation (DOT) and the Administrator of Environmental Protection Agency (EPA) as oil and petroleum products. For the purpose of this P&P, any liquid or solid products that are:

1. Flammable or combustible;
2. Designated as OPP under section 311(b) of the Federal Water Pollution Act as amended (33 U.S.C. 1321); or
3. Designated as OPP under Section 104 of the Hazardous Material Transportation Act (HMTA).

B. Site Characterization and analysis

A survey of possible oil and petroleum products' cargos and holding tanks will be performed to identify each specific hazard and to determine the appropriate safety and health control procedures needed to protect employees from the identified hazards; i.e., PCB and Benzene; prior to site entry. This survey will be done by a qualified marine chemist or professional industrial hygienist or certified industrial hygienist. All suspected conditions that may pose inhalation and/or skin absorption hazards which are immediately

dangerous to life or health, will be identified during this survey. Examples of those hazards include, but are not limited to, confined space entry and potentially explosive or flammable situations.

C. Training

All employees working on this site (such as, but not limited to; equipment operators, general laborers, supervisors and the management team responsible for the site) exposed to hazardous substances, health hazards or safety hazards, will have all training requirements under 29 CFR-OSHA and 40 CFR-EPL for removal of hazardous materials. This training will include HAZWOPER, HAZWOPER Supervisor, HAZMAT Response or HAZMAT Awareness, as appropriate.

D. Site Control

Appropriate site control programs will be implemented to control employee exposure during clean-up operations. Worker personal protective equipment will be issued appropriate to hazards identified by the pre-work survey. Decontamination Systems and supplies will be provided as determined from the pre-work survey and the personal protective equipment issued. The site control program will include posting of the areas identified as hazards, with the type of hazard encountered and the proper control measures to be taken for the specific work area of the vessel. This program will include a site identification map (i.e. platform, deck, frame number, forward, AFT and etc.), site work zone, the use of BUDDY system, site communications, alert alarm, site specific work practices and sign in-sign out procedures. Emergency and medical assistance procedures required are detailed in the Emergency Response section of this TCP.

E. Medical Surveillance

A medical surveillance program will be in effect for all the clean-up operations. All employees who are or may be exposed to OPP, will take an appropriate medical examination per requirements of 29 CFR-OSHA 1915 and 1926. Medical examinations may be combined for all hazards identified for the individual workers; IE. asbestos, HAZWOPER, OPP, lead, etc. These combined medical examinations will meet the requirements each regulated material exposure examination, as determined by the examining physician. The frequency of these medical examination are defined in 29 CFR-OSHA 1915 and 1926. An accurate record of medical surveillance as required by 29 CFR-OSHA will be retained and submitted to governmental representatives upon the completion of the scrapping.

F. Handling Drums and Containers

All drums and containers used during the clean-up will meet the appropriate DOT, OSHA and EPA regulations of the wastes that they contain. All drums and containers will be inspected and their integrity will be assured prior to being moved. All drums and containers will be labeled. All employees exposed to the transfer operations will be warned, and trained in the proper handling of the potential hazards associated with the contents of the drums and/or containers. Material handling equipment used to transfer drums and containers will be positioned and operated to minimize sources of ignition, related to the equipment, from igniting vapors released from ruptured drums or containers. Where a major or minor spill may occur, a spill containment plan will be implemented to contain and isolate the entire volume of spill. This plan includes but is not limited to:

1. The storage area is contained with absorbent materials.
2. The absorbent materials will readily be available for use.
3. Fire extinguisher type-C is available.

4. Proper sign and labels will be posted in accordance with the requirements of NFPA, DOT and EPA.
5. Proper personal protective equipment will be available within reachable distance.
6. Emergency phone numbers will be posted within 15 feet of storage area.

G. Disposal and Transportation

The most cost-effective waste disposal and transportation (D&T) means will be implemented. This D&T plan will include all necessary EPA permits under the requirements of TSCA and RCRA. The facility will be selected prior to D&T activities and its cost-effectiveness. The option of recycling will be explored which solely depends upon the quality of on board products. In the case of such recycling, the plant will be required to have all necessary permits under 40 CFR-EPL. The government will be notified about all these activities thirty days prior to generation of such wastes or recycle products. In the case of exporting these products to foreign countries, compliance with all permits required by 40 CFR EPL 262.53, 56(a) (1) through (4), (6), and (b), 262.57 and 273.25(e) and conformance with the requirements of the Organization for Economic Cooperation and Development Council (OECDC) will be in place.

References

1. 29 CFR 1910.120, Occupational Safety and Health Standards, Hazardous Waste Operations and Emergency Response

2. 40 CFR 112, Oil Pollution Prevention

3. 40 CFR 194, Response Plans for Onshore Oil Pipelines

4. 40 CFR 262, Standards Applicable to Generators of Hazardous Waste

5. 40 CFR 300, Oil and Hazardous Substances Pollution Contingency Plan

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ASBESTOS CONTAINING MATERIALS PLAN

A. Pre-Survey of Asbestos Containing Materials

A Survey Team will provide asbestos containing material (ACM) surveys. All suspect ACM's will be surveyed by an EPA accredited Asbestos Building Inspector. The Inspectors will have all necessary certificates and will be submitted prior to the survey. The materials inspected will be all suspect ACM's including but not necessarily limited to those listed:

. Bulkhead and pipe insulation;
. Bulkhead fire shields;
. Electrical cable materials;
. Brake lining;
. Floor tile and deck underlay;
. Steam, water and vent flange gaskets;
. Flexitalic gasket;
. Garlock seals;
. Shift packing;
. Valve packing;
. Pipe hanger inserts;
. Weld shop protectors and turn covers

This ACM survey will follow 40 CFR EPA and 29 CFR-OSHA guidelines for determining the presence of asbestos in materials, the Inspector may make qualified determinations as to asbestos containing or not based on his/her prior experience and training.